Mark A. Chambers
Attorney at Law
State Bar #98933
345 West Ninth Avenue, Suite 200
Escondido, California 92025-5055
Telephone: (760) 489-1808
Fax: (760) 489-0225
Attorney for Defendant,
RICARDO AVALOS-RAMIREZ

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE DANA M. SABRAW)

UNITED STATES OF AMERICA, Plaintiff, vs. RICARDO AVALOS RAMIREZ, Defendant.	CASE NO. 08-CR-1361-DMS NOTICE OF MOTIONS AND MOTIONS TO: 1) COMPEL DISCOVERY 2) LEAVE TO FILE FURTHER MOTIONS DATE: June 27, 2008 TIME: 11:00 a.m.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on June 27, 2008, at 11:00 a.m., or as soon thereafter as counsel may be heard, the defendant, RICARDO AVALOS RAMIREZ, by and through his counsel, Mark A. Chambers, hereby submits the following motions and points and authorities in support thereof:

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MOTIONS

The defendant, RICARDO AVALOS RAMIREZ, by and through his counsel, Mark A. Chambers, pursuant to Federal Rules of Criminal Procedure 12, 14, 16 and 26, the Fifth and Sixth Amendment to the Unites States Constitution, and all other applicable statutes, case law and local rules, hereby moves this Court for an Order:

Compel Production of Discovery;

Leave to File Further Motions;

These motions are based upon the instant motions and notice of motions, the attached statements of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted

Dated: May 22, 2008

/s/ Mark A. Chambers
MARK A. CHAMBERS
Attorney for Defendant
RICARDO AVALOS RAMIREZ